

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,  
v.  
KEITH RANIERE,  
Defendant.

Case No. 1:18-cr-00204-NGG-VMS

**NOTICE OF NON-STATUTORY MOTION TO  
COMPEL POST-JUDGMENT MATERIAL  
EXCULPATORY DISCOVERY**  
**EVIDENTIARY HEARING REQUESTED**  
**ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that upon Memorandum of Law, dated March 31, 2023, Mr. Keith Raniere, by and through his undersigned counsel, Joseph M. Tully, will move before the United States District Court for the Eastern District of New York for an order compelling the government to disclose the exculpatory discovery items on the grounds that Mr. Raniere is entitled to said discovery as a matter of law.

This motion is brought pursuant to fundamental constitutional due process principles advanced in *Brady v. Maryland*, 373 U.S. 83 (1963) and its progeny; *Dist. Attorney's Office for the Third Judicial Dist. v. Osborne*, 557 U.S. 52 (2009); *Wright v. U. PO, Parole Officer*, 10-CV-5127 (MKB) (E.D.N.Y. Jul. 2, 2021); and *Harvey v. Horan*, 285 F.3d 298 (4th Cir. 2002).

Dated: April 14, 2023,

Respectfully submitted,

/s/ Joseph M. Tully  
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*Admitted pro hac vice*

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